

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF ANISH PATEL ON BEHALF OF THE SATV/EMI PLAINTIFFS
IN OPPOSITION TO DEFENDANTS' SECOND MOTION TO COMPEL**

I, Anish Patel, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am currently employed as an Associate Director, Business and Legal Affairs, for Sony/ATV Music Publishing LLC ("SATV"). I have personal knowledge of the facts set forth below and/or have learned of these facts as a result of my position and responsibilities at SATV, and could and would testify competently thereto if called as a witness.

2. Plaintiffs SATV and its affiliates EMI Al Gallico Music Corp., EMI Algee Music Corp., EMI April Music Inc., EMI Blackwood Music Inc., Colgems-EMI Music Inc., EMI Consortium Music Publishing Inc. d/b/a EMI Full Keel Music, EMI Consortium Songs, Inc., individually and d/b/a EMI Longitude Music, EMI Feist Catalog Inc., EMI Miller Catalog Inc., EMI Mills Music, Inc., EMI Unart Catalog Inc., EMI U Catalog Inc., Jobete Music Co. Inc., Stone Agate Music, Screen Gems-EMI Music Inc., Stone Diamond Music Corp. (collectively, "SATV/EMI") are music publishing companies that exploit a diverse catalog of millions of songs.

3. As part of my responsibilities at SATV, I process termination notices that SATV/EMI receives pursuant to Sections 203 or 304 of the Copyright Act (17 U.S.C. §§ 203, 304).

4. I understand that this declaration is to be submitted to the Court in connection with a motion to compel (the "Motion") filed by Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, "Defendants" or "Cox"). I also understand that Cox seeks documents and information relating to [REDACTED]

[REDACTED]

5. As I testified at my deposition in this case, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. At my deposition I was asked questions about [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

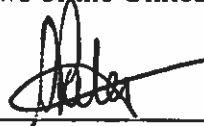
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Anish Patel

Executed this 8th day of July, 2019.